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February 9, 2024

VIA CM/ECF Filing

Honorable Arun Subramanian, United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *Jane Doe et al. v. Government of the U.S. Virgin Islands et al.*, 23-cv-10301

Dear Judge Subramanian:

I represent Cecile de Jongh and am writing to request, respectfully, that the Court order that she be given until March 15, 2024, to respond to the Complaint in the above-captioned case.

Ms. De Jongh does not concede that she has been served in compliance with the Federal Rules of Civil Procedure and/or the Rules of this Court, and therefore takes the position that there is currently no set deadline for a responsive pleading. But in an abundance of caution—and because my colleagues and I were only recently engaged to represent Ms. De Jongh and require time to become familiar with the case and prepare a response to the Complaint—we are asking the Court until March 15 to respond.¹

I conferred with Plaintiffs' counsel over email and telephone on the evening of February 8 and morning of today, February 9, about this request. Plaintiffs' counsel has confirmed that they consent to our request, on the condition that we do not object to their receiving one additional week—i.e., until April 5, 2024—to respond.

¹ I'm aware that, in the last two days, other defendants in this case have requested thirty (30) days from the dates of their respective submissions or until March 8, 2024 to respond. ECF Nos. 37, 39, 42. Because my colleague on this case and I are both traveling the week of March 4-8 and I am scheduled to argue a dispositive motion in another case on March 8, we respectfully request one additional week, until March 15, to respond.

Again, Ms. De Jongh makes this request without waiving any rights or objections, including but not limited to any objections relating to service of the Complaint.

I can be reached at aschmidt@kaiserlaw.com or at (202) 869-1301 if the Court has any questions. I thank the Court for its attention to this matter.

Sincerely,



Amelia J. Schmidt (admitted *pro hac vice*)

Counsel for Cecile de Jongh